

DESMARAIS LLP

www.desmaraisllp.com

230 Park Avenue  
New York, NY 10169

Andrew G. Heinz  
Direct: 212-351-3402  
aheinz@desmaraisllp.com

P: 212-351-3400  
F: 212-351-3401

March 6, 2015

Via ECF

Honorable Brian M. Cogan  
United States District Court Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *Luciano F. Paone v. Qualcomm, Inc.*, Case No. 2:15-cv-00647-BMC

Dear Judge Cogan:

I am counsel for Plaintiff Luciano F. Paone in the above-captioned action. Defendant Qualcomm, Inc. ("Qualcomm") has requested, and Plaintiff has agreed to, an extension of 30 days for Qualcomm to respond to Plaintiff's complaint in this action, from March 12, 2015, until April 13, 2015 (April 11 being a Saturday). This is the first request for an extension of time by either party. As Qualcomm has not yet retained counsel for this matter, I hereby respectfully request on behalf of both parties that Your Honor extend Qualcomm's time to respond to the complaint until April 13, 2015. In addition, Your Honor has set an Initial Status Conference for March 27, 2015, at 10:45 AM. (D.I. 5.) The parties also respectfully request that Your Honor postpone the Initial Status Conference, to be rescheduled at the Court's convenience after Qualcomm responds to Plaintiff's complaint.

Very truly yours,

  
Andrew G. Heinz